

Rough Transcript

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* ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *

Q. When you said that companies would come to you, was that based on anybody soliciting them?

A. No. No. Nutrisystem. Companies came to us. 12:50PM

Q. Was the company for sale?

A. We were listening to offers. That's what pretty much created the interest of us selling the company. 12:50PM

Q. Was there a discussion before the Asset Purchase Agreement about maybe selling the company?

MR. KEYHANI: Objection to form in terms of characterization of the document. 12:50PM

But you can answer the question.

A. Before we sold the company were there discussions? We had meetings of selling the company.

Q. And was it discussed at those meetings maybe we should sell the company? 12:50PM

A. We discussed it. Yeah, we were interested in selling it if the number was right of course.

Q. Okay. And in those discussions, what 12:51PM

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was the number that was being discussed?

A. Nutrisystem offered us, I don't want to give the wrong numbers, but somewhere around \$50 million. 12:51PM

Q. And do you recall what the number was when the company was actually sold?

A. We were originally promised somewhere about \$10 million and I'm not sure what happened because I wasn't here, but it wound up a couple hundred thousand dollars each partner wound up receiving. 12:51PM

That's from Kevin so something happened. I'm not sure why it dropped because I wasn't here, but originally it was discussed \$10 million and it wound up going down to a couple hundred thousand dollars. I mean really -- 12:52PM

Q. Would it be accurate --

MR. KEYHANI: Please let him finish.

Were you finished with your answer? 12:52PM

THE WITNESS: Yeah.

A. Like I said, I wasn't here, so pretty much I had no control over that because I was away, but all I kept hearing was that we're getting less, we're getting less, we're getting 12:52PM

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less and I don't know why.

I did the marketing and advertising for the company. I mean that's my forte. That's what I do. I'm very good at it. I'm not saying it in a cocky way. It's just, you know, I built two great companies and going on my third company, so I definitely understand the market better than anyone out there as far as I have that formula and I can acquire clients very, very easily because I have that formula, I created that formula. 12:52PM

So I guess with me not being here, let's go back to Zone Gourmet, they had 3,000 clients. When I left that company, it went down to 500 clients. 12:52PM

I don't know what Chef's Diet is doing right now, but I wouldn't assume that they're doing 4,300 clients or 4,000, 3,000 clients like they were when we gave them the company, but I'm not sure. Maybe they are. 12:53PM

So but, you know, without the marketing, without, you know, and I'm not going to pat myself on the back, but I understand the marketing better than most. And, you know, 12:53PM

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there's a reason why right now we're growing because of my marketing efforts. And once again, that's a combination of a lot of different things that we do with marketing that helps to acquire the clients. 12:53PM

Q. Would it be accurate to say that you did not have any part in the negotiations of the agreement because of your incarceration?

A. I was there for the beginning part when we were talking about \$10 million, but I wasn't there -- I don't know what created us only getting 250,000, \$300,000. I don't know what happened to create that, and once again, I had no control because of where I was. 12:54PM

Q. So when you came out of prison, did you seek to go back to Chef's Diet?

A. Kevin, when I was in -- when I was there in prison, about a month before I was released, a month or two months before, Kevin took an eight-hour trip to visit me. Kevin offered me a million shares and \$2,500 a week because he said I could single-handedly bring the company -- he knew -- he believed in me that I could bring the company back to where it was. 12:55PM

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 Kevin made me that offer. Kevin sent an email</p> <p>3 ou to all the shareholders saying that the old</p> <p>4 CEO is coming -- he offered me \$2,500 a week and</p> <p>5 a million shares. 12:55PM</p> <p>6 He took that trip to visit me in</p> <p>7 Allenwood right before I was released, and made</p> <p>8 me that offer because he said, "You can fix the</p> <p>9 company." He said the company was losing money</p> <p>10 at that point. They didn't know how to do the 12:55PM</p> <p>11 marketing and the advertising so he took that</p> <p>12 trip to visit me and made me that offer.</p> <p>13 He sent an email out to all his</p> <p>14 investors, which we're looking to get that</p> <p>15 email, saying that the CEO was coming back, 12:55PM</p> <p>16 great news. And I'm coming back to, you know,</p> <p>17 bring growth to the company again.</p> <p>18 When I came home, I looked at his</p> <p>19 numbers and I seen that he was losing \$1 million</p> <p>20 a year, and at that point I decided I didn't 12:55PM</p> <p>21 want to get involved in something like that. It</p> <p>22 seemed like just way too much work for me to get</p> <p>23 involved in.</p> <p>24 But Kevin believed in my ability and</p> <p>25 that's why he took that eight-hour trip. 12:56PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 Q. When you say you looked at his</p> <p>3 numbers, what --</p> <p>4 A. He showed me something that was like</p> <p>5 a half a million dollars. He said, "We're only 12:56PM</p> <p>6 losing a half a million dollars."</p> <p>7 And I told Kevin, "That's a half a</p> <p>8 year." I said, "You're not showing me your</p> <p>9 annual numbers..." I said, "...so you're</p> <p>10 probably losing about a million a year." 12:56PM</p> <p>11 He said, "Right, but you can fix</p> <p>12 that."</p> <p>13 It's a lot of work taking a company</p> <p>14 that's declining like that and trying to fix it.</p> <p>15 I didn't want to get involved with that. 12:56PM</p> <p>16 Q. Is it more or less work -- strike</p> <p>17 that.</p> <p>18 Is it more work to try and rebuild an</p> <p>19 existing company or to start a totally new</p> <p>20 company? 12:57PM</p> <p>21 MR. KEYHANI: Objection to form.</p> <p>22 You can answer.</p> <p>23 A. I don't know. I don't know. I</p> <p>24 haven't done both of them together, so I can't</p> <p>25 give you an accurate answer unless I've done 12:57PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 both of them.</p> <p>3 Q. Well, you did that with Zone Gourmet,</p> <p>4 right?</p> <p>5 A. When I left Zone Gourmet, I never 12:57PM</p> <p>6 came back to Zone Gourmet to help them rebuild</p> <p>7 again. I never went back to any company and</p> <p>8 tried to help them rebuild again, so I couldn't</p> <p>9 give you that other side of the equation.</p> <p>10 Q. How was the company doing, Chefs 12:57PM</p> <p>11 Diet, at the time of the Asset Purchase</p> <p>12 Agreement?</p> <p>13 MR. KEYHANI: Objection to form to</p> <p>14 the extent it calls for a legal conclusion</p> <p>15 and the time that we're talking about. 12:57PM</p> <p>16 You can answer the question.</p> <p>17 A. From what I recall, probably \$28</p> <p>18 million in revenue, \$30 million in revenue I</p> <p>19 would assume. Something like that. I'm not</p> <p>20 sure. I don't want to give you an inaccurate 12:58PM</p> <p>21 answer, but it's in that range.</p> <p>22 Q. And profits?</p> <p>23 A. Not sure.</p> <p>24 Q. Do you know if the company was losing</p> <p>25 money? 12:58PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 A. I know that at one point we had about</p> <p>3 \$2 million in the escrow account saved.</p> <p>4 When we were discussing selling the</p> <p>5 company, we had about 2.3, \$2 million in the 12:58PM</p> <p>6 escrow account saved.</p> <p>7 Q. But was the company losing money on</p> <p>8 an annual basis? Do you know?</p> <p>9 A. Kevin and Keith Lyon ** and</p> <p>10 Mr. Rosenbaum, even though they didn't purchase 12:58PM</p> <p>11 the company, they were still giving us decisions</p> <p>12 on marketing and advertising, so at that point</p> <p>13 they changed the whole strategy of the marketing</p> <p>14 and advertising and we did see a decline in</p> <p>15 sales based on some of the ideas that they were 12:58PM</p> <p>16 coming up with.</p> <p>17 Q. Do you know whether in March of 2009</p> <p>18 the company was losing money?</p> <p>19 A. I don't recall.</p> <p>20 Q. Do you think that the company's 12:59PM</p> <p>21 financial performance in March of 2009 was</p> <p>22 factored into the sale price?</p> <p>23 A. I don't recall.</p> <p>24 Q. No one told you that the reason you</p> <p>25 didn't get \$10 million or \$1 million was because 12:59PM</p>

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 of the performance of the company?</p> <p>3 A. I was coming up with advertising and</p> <p>4 marketing ideas. That's what I do. And Keith</p> <p>5 Lyon, who was the CEO for Kevin, was shooting 12:59PM</p> <p>6 every one of my ideas down.</p> <p>7 So at that point I was not doing the</p> <p>8 marketing and the advertising for that last year</p> <p>9 at all, so without me doing the marketing, once</p> <p>10 again, you know, I have that formula and if they 12:59PM</p> <p>11 wouldn't let me use my formula, there will be a</p> <p>12 decline.</p> <p>13 Q. My question was did anyone tell you</p> <p>14 that the reason the company didn't get \$10</p> <p>15 million or \$1 million was because of its 01:00PM</p> <p>16 financial performance?</p> <p>17 MR. KEYHANI: Objection. Asked and</p> <p>18 answered.</p> <p>19 MR. O'BRIEN: Not answered.</p> <p>20 A. I wasn't speaking to anyone because I 01:00PM</p> <p>21 was away and I didn't have, you know, Alex or</p> <p>22 Misha or anybody else. What I was told is what</p> <p>23 we got and that was it. But from my</p> <p>24 understanding is, you know, without the</p> <p>25 marketing and the advertising, the company every 01:00PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 single year continued to drop.</p> <p>3 Q. When was this email that Kevin Glodek</p> <p>4 sent you with the offer of employment?</p> <p>5 MR. KEYHANI: Objection to form. 01:01PM</p> <p>6 A. He offered me that personally in</p> <p>7 Allenwood when he took the ride eight hours,</p> <p>8 four hours there and four hours back. He made</p> <p>9 me that offer there.</p> <p>10 Q. And you, correct me if I'm wrong, but 01:01PM</p> <p>11 you said that he sent out an email to the</p> <p>12 investors notifying them that you were coming</p> <p>13 back?</p> <p>14 A. That is correct.</p> <p>15 Q. And do you recall approximately when 01:01PM</p> <p>16 that was?</p> <p>17 A. It was -- I came home August 20th.</p> <p>18 Within a month. Within a month after that.</p> <p>19 Q. So September of 2011?</p> <p>20 A. It could have been anywhere from 01:01PM</p> <p>21 August after he visited me. It could have been</p> <p>22 -- let me give you something, a better gauge</p> <p>23 because he might have sent the email out to the</p> <p>24 investors after he had the meeting with me in</p> <p>25 Allenwood. So let's say it could have been from 01:02PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 anywhere late July to September, within that</p> <p>3 range.</p> <p>4 And when I declined, he was upset</p> <p>5 because he said he already sent an email to all 01:02PM</p> <p>6 the investors letting them know I'm coming back,</p> <p>7 so he was a little bit upset over that.</p> <p>8 Q. When did you first consider creating</p> <p>9 another diet delivery company?</p> <p>10 A. Not when I first came home. I mean 01:02PM</p> <p>11 we had a noncompete so I had to make sure we</p> <p>12 honored the noncompete.</p> <p>13 Pretty much I got involved with</p> <p>14 helping Mr. Zazza with the DigiPBX, doing sales</p> <p>15 for that. Pretty much, yeah, really didn't do 01:03PM</p> <p>16 anything until, you know, until I guess a couple</p> <p>17 years after, a year or a year-and-a-half after,</p> <p>18 year later. I'm not really sure exactly what</p> <p>19 the dates are.</p> <p>20 Q. Give me your best approximation of 01:03PM</p> <p>21 when you first formulated a plan to create a</p> <p>22 competing company?</p> <p>23 A. It had to be maybe 2013 I'm thinking.</p> <p>24 I'm not sure. I don't want to give you an</p> <p>25 inaccurate number, an inaccurate date. I'm 01:03PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 under oath so I want to make sure I'm giving you</p> <p>3 the accurate number.</p> <p>4 Q. Sometime in 2013.</p> <p>5 Is that your best answer? 01:03PM</p> <p>6 A. It could have been 2013, yeah. Close</p> <p>7 to it I would think, yes.</p> <p>8 The noncompete was already -- before</p> <p>9 we opened, the noncompete was already done.</p> <p>10 Q. When did you communicate your idea 01:04PM</p> <p>11 with anybody else about creating a competing</p> <p>12 company?</p> <p>13 MR. KEYHANI: Objection to form.</p> <p>14 A. When you say anyone else.</p> <p>15 Q. When did you tell somebody? When was 01:04PM</p> <p>16 the first time you said to somebody hey, I've</p> <p>17 got this great idea of starting up a new</p> <p>18 company?</p> <p>19 A. I don't know what the exact date is.</p> <p>20 Q. Who did you talk to? 01:04PM</p> <p>21 MR. KEYHANI: Objection to form.</p> <p>22 A. I don't know. My wife? I don't</p> <p>23 know. My daughter maybe? I'm not sure who I</p> <p>24 told, but probably family would be the first</p> <p>25 people I would speak to. 01:04PM</p>

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2 Q. That was just a for instance.

3 Did you make any search anywhere for

4 documents in connection with this lawsuit?

5 A. I know Mr. Zazza did that of course. 01:10PM

6 Q. But did you personally do that?

7 A. I don't deal with servers and things

8 like that so I don't know. I don't know where

9 to look. I'm not a technology guy.

10 Q. Is the answer to my question no? 01:10PM

11 MR. KEYHANI: Objection to form.

12 BY MR. O'BRIEN:

13 Q. You can answer.

14 MR. KEYHANI: You can answer the

15 question. 01:10PM

16 A. Personally I don't -- I'm not a

17 technology guy. That's not what I do. So, you

18 know, personally do -- where would I look? I

19 don't know where I would look.

20 Mr. Zazza could find anything. With 01:10PM

21 email, he would be able to find that himself.

22 Q. So you personally did not undertake

23 to search for any documents, correct?

24 MR. KEYHANI: Objection. Asked and

25 answered. 01:10PM

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2 up with names and names and names, and what do

3 you think and back and forth until you have a

4 bunch names and then you see what's available,

5 and then you pick which one you feel is your 01:13PM

6 best.

7 Q. Did Mr. Zazza make some suggestions

8 about possible names?

9 A. We both do. We both did.

10 Q. Anybody else chime in with 01:13PM

11 suggestions about possible names to use?

12 A. His wife might have. Lisa Zazza

13 might have helped us with the names.

14 Q. She might have or she did?

15 A. I would think she did possibly. 01:13PM

16 Q. Do you have a specific recollection

17 of her being part of your conversations about

18 this?

19 A. I would think that through the

20 brainstorming we share ideas, and if she gave us 01:14PM

21 some ideas also. I think she was there with the

22 conversation, in the conversation, so probably

23 the three of us. No one else probably

24 brainstormed beyond that. It's just the three

25 of us until we came up with a name. 01:14PM

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2 You can answer the question.

3 A. Correct.

4 Q. How did you come up with the name

5 Lean Chefs? 01:11PM

6 A. Once again, the same way; pretty much

7 looking at a bunch of names, going through a

8 list, going onto, let's say, GoDaddy domain, Buy

9 domain, seeing what's available and then

10 whatever was available, that's how you determine 01:12PM

11 a name. Same way I've always done it.

12 Q. And just so that we're clear, I'm not

13 asking you how you chose to determine whether a

14 name you were thinking of was free to use. I

15 was asking how did you come up with names to 01:12PM

16 even search if they were created.

17 A. Just brainstorming.

18 Q. And with whom did you brainstorm?

19 A. Mr. Zazza.

20 Q. Where were you when you brainstormed? 01:13PM

21 A. I don't recall. It could have been,

22 you know, a phone conversation. It could have

23 been in person. I'm not sure.

24 I mean brainstorming is not a

25 one-time thing. It's just continuously coming 01:13PM

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1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *

2 Q. How many names other than Lean Chefs

3 did you come up with to search for?

4 A. We go through hundreds. Hundreds.

5 We just keeping making up names and making up 01:14PM

6 names and making up names, and some will stick,

7 some won't. I mean I'm sure the same thing with

8 Zone Chefs and Chefs Diet. It's the same

9 formula, to come up with a bunch of names and

10 whatever is available, you know, then you pick 01:14PM

11 the best one and you go with it.

12 Q. Did the other names that you came up

13 with have the word "chefs" in it?

14 A. Chefs is a very hot -- it's, you

15 know, with chefs on TV, a lot of celebrity 01:15PM

16 chefs, so yeah, I would say, you know, a lot of

17 them had the word "chefs" in it. A lot of them

18 could have had food. A lot of them could have

19 had meals. Just trying to, you know, just a

20 bunch names, but chef is a pretty hot name 01:15PM

21 because lately there's been a lot of celebrity

22 chefs on television at that point and chefs are

23 getting pretty famous; Mario Batali, all these

24 big names. Jean-Georges. So chefs is a big

25 name so I figured that would be one of the best 01:15PM

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 choices.</p> <p>3 Back in the days, it was zone. I</p> <p>4 would come up with a bunch names for zone</p> <p>5 because zone was the hot topic, the hot name. 01:15PM</p> <p>6 So it's just whatever the industry is.</p> <p>7 Q. What were some of the other names</p> <p>8 that were in contention?</p> <p>9 A. I don't recall. Once we throw a name</p> <p>10 out, it's just a name. It's either it wasn't 01:16PM</p> <p>11 available, so I really don't know what the other</p> <p>12 names are.</p> <p>13 Q. The domain name for Lean Chefs was</p> <p>14 available, correct?</p> <p>15 A. To purchase, yes. 01:16PM</p> <p>16 Q. And you did purchase it?</p> <p>17 A. Yes.</p> <p>18 Q. When?</p> <p>19 A. I don't recall, but I know we did</p> <p>20 purchase the name. 01:16PM</p> <p>21 Q. You have a record of that purchase,</p> <p>22 correct?</p> <p>23 A. I'm sure we do.</p> <p>24 MR. O'BRIEN: I call for the</p> <p>25 production of that record. 01:16PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 BY MR. O'BRIEN:</p> <p>3 Q. Do you remember what you paid for it?</p> <p>4 A. I'm not sure. I don't want to give</p> <p>5 you the wrong answer. I'm not sure. 01:16PM</p> <p>6 It was definitely not a regular</p> <p>7 domain for like \$9 or \$10. I think it was</p> <p>8 something that there was a premium on that. It</p> <p>9 could have been a thousand or two. I'm not</p> <p>10 sure. Once again, I don't want to give you an 01:17PM</p> <p>11 inaccurate number.</p> <p>12 (Plaintiff's Exhibit 3, Defendants'</p> <p>13 Supplemental Responses and Objections to</p> <p>14 Plaintiff's First Set of Interrogatories,</p> <p>15 marked for identification, as of this</p> <p>16 date.)</p> <p>17 BY MR. O'BRIEN:</p> <p>18 Q. Have you seen what we marked as</p> <p>19 Exhibit 3 before?</p> <p>20 A. I don't recall. 01:17PM</p> <p>21 Q. Do you understand that the plaintiff</p> <p>22 in this case has made certain requests for</p> <p>23 information?</p> <p>24 A. Okay. Yes. Based on this.</p> <p>25 Q. If you look at page 3 of this 01:18PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 document, do you recall providing any</p> <p>3 information in response to the requests made in</p> <p>4 this document?</p> <p>5 MR. KEYHANI: Take a moment to look 01:18PM</p> <p>6 at it.</p> <p>7 (Document review.)</p> <p>8 MR. KEYHANI: You can read through it</p> <p>9 if you want.</p> <p>10 THE WITNESS: Which part? 01:19PM</p> <p>11 MR. KEYHANI: He's at page 3, but</p> <p>12 take a look at it.</p> <p>13 A. One to \$2,000 for domain, so that</p> <p>14 seems pretty accurate. That's what it says</p> <p>15 here, \$2,000. 01:19PM</p> <p>16 Q. My question was not that.</p> <p>17 My question was do you recall</p> <p>18 providing any information in response to the</p> <p>19 requests made in this document?</p> <p>20 A. I know there was a request for emails 01:19PM</p> <p>21 and things like that, and I know, I think we --</p> <p>22 I'm not sure because I didn't send it over,</p> <p>23 Mr. Zazza sent it over. You have to ask him.</p> <p>24 Q. This is a different document. This</p> <p>25 has questions in it. 01:20PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 My only question to you is, do you</p> <p>3 recall providing information --</p> <p>4 A. Which question exactly are you --</p> <p>5 Q. Any of the questions. 01:20PM</p> <p>6 A. Can you give me an example?</p> <p>7 Q. Sure.</p> <p>8 Take a look at on page 4, Question</p> <p>9 No. 2.</p> <p>10 A. Right. 01:20PM</p> <p>11 Q. The answer to that question, did you</p> <p>12 provide any of that information?</p> <p>13 MR. KEYHANI: Read it carefully.</p> <p>14 (Document review.)</p> <p>15 A. Brainstorming meeting in 2013. This 01:20PM</p> <p>16 is what I just told you.</p> <p>17 Domain sale \$2,000. That's what I</p> <p>18 just mentioned also.</p> <p>19 (Document review.)</p> <p>20 Q. Is that date right? 01:21PM</p> <p>21 A. Yeah, I guess that's pretty close to</p> <p>22 be accurate I would think.</p> <p>23 Q. Why do you think that now?</p> <p>24 A. Because I know it was before we</p> <p>25 opened, so months before we opened so that seems 01:21PM</p>

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 could help us and give us the best rates.</p> <p>3 Q. And the mail service takes care of</p> <p>4 taking the names that you give it and ensuring</p> <p>5 that the addresses are placed on the fliers, 01:45PM</p> <p>6 correct?</p> <p>7 A. They would do the fulfillment on it</p> <p>8 and they would mail it, yes.</p> <p>9 Q. Did you hire a company such as that?</p> <p>10 A. Yes. Yes. To do that type of 01:46PM</p> <p>11 fulfillment for us, yes.</p> <p>12 Q. And who was that?</p> <p>13 A. I forgot the exact name.</p> <p>14 Q. Was it Select Mail?</p> <p>15 A. Select Mail, that's it, um-hmm. 01:46PM</p> <p>16 Q. When were they hired?</p> <p>17 A. I don't recall. I don't want to give</p> <p>18 you the wrong date.</p> <p>19 Q. Does Select Mail scrub the lists that</p> <p>20 you give to it? 01:46PM</p> <p>21 MR. KEYHANI: Objection to form.</p> <p>22 A. Do they scrub the list? I'm not sure</p> <p>23 if they scrub it to see if people moved. We</p> <p>24 used to do that with the old company. I'm not</p> <p>25 sure. 01:47PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 I mean pretty much I would say no. I</p> <p>3 would say they just mail out, you know, what we</p> <p>4 give them and if something bounces back and it</p> <p>5 comes back to Select Mail, then they would just 01:47PM</p> <p>6 take it off the list, because why mail something</p> <p>7 again if the address is no good.</p> <p>8 Q. So you don't know if you have anybody</p> <p>9 that takes the lists that you provide and before</p> <p>10 the mailing goes out, tries to determine how 01:47PM</p> <p>11 many of the addresses are no longer good?</p> <p>12 A. Not that I recall.</p> <p>13 Q. Is there any industry standard for</p> <p>14 percentage of bad addresses in a list?</p> <p>15 A. Not that I know of. I'm sure there's 01:47PM</p> <p>16 numbers, but I'm not aware of that.</p> <p>17 Q. When was your first mailing to</p> <p>18 prospective customers by Lean Chefs?</p> <p>19 A. Possibly December 2013. Right when</p> <p>20 we opened, right around then. 01:48PM</p> <p>21 Q. Where did you get the names and</p> <p>22 addresses to mail to?</p> <p>23 A. The way we got our names was from</p> <p>24 Epsilon, which is a data company.</p> <p>25 Also purchased names at the lead 01:48PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 show, which was **Leadcom and Ad Tech, so it</p> <p>3 could have been from -- I'm not really sure</p> <p>4 where they came from, but probably one of those</p> <p>5 two I would have to assume. 01:49PM</p> <p>6 Q. Do you know?</p> <p>7 A. To be accurate, I would have to -- I</p> <p>8 don't want to assume, but I would think that it</p> <p>9 could have been a combination of both or it</p> <p>10 could have -- I'm not sure of the exact amount 01:49PM</p> <p>11 we mailed. Maybe it was 50,000. If it was,</p> <p>12 then it was probably from Epsilon.</p> <p>13 Q. You have invoices from those sellers</p> <p>14 of names, right?</p> <p>15 MR. KEYHANI: Objection to form. 01:49PM</p> <p>16 You can answer the question.</p> <p>17 A. I would assume. From Epsilon?</p> <p>18 Q. From Epsilon and --</p> <p>19 A. Yeah, Epsilon. If we purchased, then</p> <p>20 I would have an invoice from that. 01:49PM</p> <p>21 From the lead show, I bought it from</p> <p>22 an individual, just a data seller, so I don't</p> <p>23 have an invoice from him, but that's common</p> <p>24 practice at the shows.</p> <p>25 Q. Do you have any documentation at all 01:50PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 of purchases of names that you made at the shows</p> <p>3 that you mentioned?</p> <p>4 A. No, I don't. We have a receipt that</p> <p>5 we went to the show. It cost us I think \$750 01:50PM</p> <p>6 each to go to the show, and we went to the show</p> <p>7 to get data for diet. So I believe we have the</p> <p>8 receipt for the --</p> <p>9 Q. Attendance, right?</p> <p>10 A. Yes, we do. And we went there to get 01:50PM</p> <p>11 data for diet.</p> <p>12 Q. No invoice, Bill of Sale or any other</p> <p>13 document which shows that you made any purchase</p> <p>14 at those shows?</p> <p>15 A. No, but it's common practice. I 01:50PM</p> <p>16 don't know if you're familiar with how data</p> <p>17 works. These shows, what you have is you have</p> <p>18 all the big players, all the guys, the big data</p> <p>19 companies, they sit in the bars and they do</p> <p>20 deals in the bars all day long. They don't even 01:50PM</p> <p>21 go into the show.</p> <p>22 I've been doing this for a long time,</p> <p>23 so I know any show you go to, Leadcom, Ad Tech,</p> <p>24 most of the deals are done right outside of the</p> <p>25 show in the lounge area. They set meetings up 01:51PM</p>

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 A. A customer of Chefs Diet, I mean the</p> <p>3 industry, I don't know if you're familiar with</p> <p>4 the industry, but a lot of these clients, they</p> <p>5 bounce around to all these different companies. 01:56PM</p> <p>6 So I'm not sure what is -- when you say customer</p> <p>7 list it confuses me because I'm in the aware of</p> <p>8 a customer list.</p> <p>9 Are you saying that customers that</p> <p>10 they market to? Is that what you're saying? 01:56PM</p> <p>11 Q. Listen to my question.</p> <p>12 Did you understand at the time that</p> <p>13 you were excellencing your marketing program for</p> <p>14 Lean Chefs that Mr. Zazza had in his possession</p> <p>15 a list of present customers of Chefs Diet? 01:56PM</p> <p>16 MR. KEYHANI: Objection to form.</p> <p>17 Calls for facts not on the record but you</p> <p>18 can answer the question.</p> <p>19 MR. O'BRIEN: I'm just asking him</p> <p>20 questions. 01:56PM</p> <p>21 A. I became aware of a list that was</p> <p>22 sent to Mr. Zazza as we're going through this I</p> <p>23 guess litigation, so I became aware of the fact</p> <p>24 that there was a list sent to Nick, Mr. Zazza,</p> <p>25 in 2010 from one of the partners of Chefs Diet. 01:57PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 He was given a list from Misha Podlog, that's</p> <p>3 correct. If that's the list that you are</p> <p>4 talking about, I just became aware of that</p> <p>5 recently with this case. 01:57PM</p> <p>6 Q. And in addition to a list of active</p> <p>7 customers of Chefs Diet, were you aware that</p> <p>8 Mr. Zazza also had a list of inactive customers</p> <p>9 of Chefs Diet?</p> <p>10 A. You would have -- 01:57PM</p> <p>11 MR. KEYHANI: Objection to form you</p> <p>12 can answer.</p> <p>13 A. You have to ask Mr. Zazza about that.</p> <p>14 Q. I will, but I'm asking you, were you</p> <p>15 aware -- 01:57PM</p> <p>16 A. Was I aware no, you have to ask</p> <p>17 Mr. Zazza about that.</p> <p>18 Q. Do you, as you sit here today, have</p> <p>19 an understanding that at the time you started</p> <p>20 operations of Lean Chefs, Mr. Zazza had a list 01:57PM</p> <p>21 of inactive customers of Chefs Diet?</p> <p>22 MR. KEYHANI: Objection. Asked and</p> <p>23 answered. But you can answer the question.</p> <p>24 A. You have to ask Mr. Zazza.</p> <p>25 Personally, I'm not aware -- as we're doing this 01:58PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 case now and we're going through the data and</p> <p>3 Mr. Zazza was telling me that, you know, in 2010</p> <p>4 he received a list from Misha Podlog and some of</p> <p>5 the names I guess that were given to us of 01:58PM</p> <p>6 clients that were solicited to, some of them</p> <p>7 were on that list and some of those clients were</p> <p>8 actually on the list of the data that we bought</p> <p>9 at the shows. So I became aware of this during</p> <p>10 this case. 01:58PM</p> <p>11 Q. And did Lean Chefs send fliers to the</p> <p>12 people on the list that Mr. Zazza had?</p> <p>13 MR. KEYHANI: Objection to form.</p> <p>14 Had, when, where, what? Which list?</p> <p>15 MR. O'BRIEN: Counsel. 01:58PM</p> <p>16 MR. KEYHANI: You can answer the</p> <p>17 question if you can.</p> <p>18 MR. O'BRIEN: Just make your</p> <p>19 objection. Don't speak.</p> <p>20 MR. KEYHANI: I'm objecting because 01:58PM</p> <p>21 the question to form is vague and</p> <p>22 incomprehensible.</p> <p>23 MR. O'BRIEN: Then make your</p> <p>24 objection.</p> <p>25 MR. KEYHANI: I have. 01:59PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 MR. O'BRIEN: Leave it at that.</p> <p>3 MR. KEYHANI: I have.</p> <p>4 A. And again when you say --</p> <p>5 MR. O'BRIEN: Let me clear it up. 01:59PM</p> <p>6 BY MR. O'BRIEN:</p> <p>7 Q. The list that you just explained you</p> <p>8 became aware of --</p> <p>9 A. Yes.</p> <p>10 Q. That Mr. Zazza had in his possession 01:59PM</p> <p>11 --</p> <p>12 A. Right, that was given to him from</p> <p>13 Misha Podlog.</p> <p>14 Q. In 2010?</p> <p>15 A. Right. 01:59PM</p> <p>16 Q. Let me ask the question before you</p> <p>17 answer, okay?</p> <p>18 A. Um-hmm.</p> <p>19 Q. Wait for me to finish?</p> <p>20 A. Of course, always. 01:59PM</p> <p>21 Q. The list that you told me about a</p> <p>22 moment ago that Mr. Zazza had, that he had in</p> <p>23 2010, were those people sent fliers by Lean</p> <p>24 Chefs in its first or second mailing?</p> <p>25 MR. KEYHANI: Objection to form. You 01:59PM</p>

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 can answer the question.</p> <p>3 A. If they were sent, it wasn't</p> <p>4 intentional. But if some of those names, the 01:59PM</p> <p>5 names that you have given us that were mailed</p> <p>6 to, they came from, we've isolated where they've</p> <p>7 come from and some of the names were on the list</p> <p>8 that was given to Mr. Zazza in 2010 and some of</p> <p>9 the names were on the leads -- on the data that</p> <p>10 was purchased at the show. Once again, not 02:00PM</p> <p>11 intentional.</p> <p>12 Q. And how do you know that?</p> <p>13 A. Because the way we build the routes</p> <p>14 in the area I would tell Mr. Zazza I would need</p> <p>15 names for certain areas so it was all done 02:00PM</p> <p>16 through geographic in order to keep the routes</p> <p>17 growing because you have drivers and you want to</p> <p>18 make sure the drivers continue to have stops</p> <p>19 otherwise they're not going to work for you. So</p> <p>20 I would just tell Mr. Zazza I need X amount of 02:00PM</p> <p>21 names in a certain area to mail and he would</p> <p>22 send me the list. And you know he has hundreds</p> <p>23 of thousands of names so he would pull it</p> <p>24 probably based on the area. So with that said,</p> <p>25 I know it was never done intentional. 02:00PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 Q. Listen to my question, okay? Because</p> <p>3 mine was a little different.</p> <p>4 A. Okay.</p> <p>5 Q. You said that you isolated where the 02:01PM</p> <p>6 names came from and some of the names were on</p> <p>7 the list that was given to Mr. Zazza in 2010 and</p> <p>8 some of the names were on the list lists that</p> <p>9 you purchased on the show.</p> <p>10 A. Yes. 02:01PM</p> <p>11 Q. Okay. My question to you is, how do</p> <p>12 you know that?</p> <p>13 A. Because I became aware of it during</p> <p>14 this case.</p> <p>15 Q. How did you become aware of it? 02:01PM</p> <p>16 A. It was brought up to me from</p> <p>17 Mr. Zazza.</p> <p>18 MR. KEYHANI: I want to note an</p> <p>19 objection to form because you say names I</p> <p>20 don't know what names you're talking about 02:01PM</p> <p>21 but if you understand the question, you can</p> <p>22 absent it.</p> <p>23 MR. O'BRIEN: I think we're pretty</p> <p>24 clear.</p> <p>25 A. Once again you're saying customers, 02:01PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 people that Chefs Diet markets to, is that what</p> <p>3 you're saying?</p> <p>4 Q. People specifically mailed to.</p> <p>5 A. That Chefs Diet mails to? 02:01PM</p> <p>6 Q. No.</p> <p>7 A. See that data you have to understand</p> <p>8 one thing, that if we would have thought at any</p> <p>9 time that that data was from Chefs Diet, you</p> <p>10 know, that's not great data. I wouldn't that 02:02PM</p> <p>11 type of data. We wouldn't waste our time mailing</p> <p>12 to that type of data because Chefs Diet doesn't</p> <p>13 advertise. They have no money for advertising</p> <p>14 as far as I understand. They're not on TV,</p> <p>15 they're not on radio. So from what I 02:02PM</p> <p>16 understand, that data is beat up. All they do</p> <p>17 is call that data every single day and harass</p> <p>18 these people. The majority of those people are</p> <p>19 on a do not call list. It's wasted data. For</p> <p>20 us, it wouldn't be -- if we had a choice of data 02:02PM</p> <p>21 that we want to market to, we want fresh leads</p> <p>22 that come from Epsilon, brand new consumers,</p> <p>23 brand new people started X amount of dollars.</p> <p>24 We want to make them aware of the industry.</p> <p>25 That data to me wouldn't be good data because 02:02PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 that data has been hit seven years in a row it</p> <p>3 eat actually probably some of the worse data you</p> <p>4 want to get involved with definitely that</p> <p>5 wouldn't be our choice. 02:02PM</p> <p>6 Q. When you say that the list that was</p> <p>7 given to Mr. Zazza in 2010 by Misha Podlog,</p> <p>8 that's what he told you?</p> <p>9 A. Yes.</p> <p>10 Q. You have no personal knowledge of 02:03PM</p> <p>11 that, right?</p> <p>12 A. I wasn't here in 2010.</p> <p>13 Q. So you have no personal knowledge of</p> <p>14 that, right?</p> <p>15 A. I wasn't there. Unless I was cc'd 02:03PM</p> <p>16 where I was at, which was impossible so, no.</p> <p>17 Q. And when you say that it was given to</p> <p>18 Mr. Zazza in 2010, do you know if he was</p> <p>19 performing services for Chefs Diet in 2010?</p> <p>20 A. I would assume he was. But once 02:03PM</p> <p>21 again you have to ask Mr. Zazza. I don't want</p> <p>22 to speculate.</p> <p>23 MR. O'BRIEN: Let's take a break.</p> <p>24 MR. KEYHANI: A short lunch break.</p> <p>25 MR. O'BRIEN: Yeah. 02:04PM</p>

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 marked for identification, as of this</p> <p>3 date.)</p> <p>4 BY MR. O'BRIEN:</p> <p>5 Q. Let me show you what we marked as 03:31PM</p> <p>6 Exhibit 7 for identification. Again, that's</p> <p>7 your address at the top, right? You sent this?</p> <p>8 A. Um-hmm.</p> <p>9 Q. In January of 2014, who determined</p> <p>10 how often the company would make mailings? 03:32PM</p> <p>11 A. Who would determine that? Pretty</p> <p>12 much based on the geographic of the routing, I</p> <p>13 would use that as a gauge. So if the drivers</p> <p>14 will tell me they need more stops let's say in</p> <p>15 New Jersey, then I would do a mailing in New 03:32PM</p> <p>16 Jersey. If they want to fill up routes because</p> <p>17 they have certain employees that work in each</p> <p>18 one of these areas and if they don't have stops</p> <p>19 then it's going to lose the drivers. When he</p> <p>20 would let me know certain routes are down that 03:32PM</p> <p>21 would help plea to determine where we're going</p> <p>22 to do the drops to and if the routes were going</p> <p>23 well, then I would pretty much not have to do</p> <p>24 mailers around I would go more with TV and radio</p> <p>25 but other way mailers targets areas. 03:32PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 Q. My question was just who made the</p> <p>3 determination. I take it it was you?</p> <p>4 A. It was me from the drivers letting me</p> <p>5 know the areas to me that I would figure it out 03:33PM</p> <p>6 exactly what area needed help.</p> <p>7 Q. Down about a little less than halfway</p> <p>8 down it says Lisa, this is for the mailer</p> <p>9 tomorrow to New Jersey and for half the</p> <p>10 fulfillment for next week's 25,000 drop? 03:33PM</p> <p>11 A. Okay.</p> <p>12 Q. This is mid-January and the previous</p> <p>13 exhibit was late December. Does that help you</p> <p>14 remember how often mailings were made at the</p> <p>15 beginning of Lean Chefs? 03:33PM</p> <p>16 A. It's just part of our advertising</p> <p>17 campaign. I mean we're doing radio too.</p> <p>18 Q. I'm just asking about the mailings.</p> <p>19 A. Right. It's a combination of</p> <p>20 everything. You can look at one thing but it's 03:33PM</p> <p>21 not one thing. It's a combination of</p> <p>22 everything. If you're looking at the whole</p> <p>23 picture yes we did some mailings, some radio, a</p> <p>24 little bit of everything we did, you know,</p> <p>25 during that time. 03:34PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 Q. Who is George Fiala?</p> <p>3 A. Select Mail.</p> <p>4 Q. You got an address at the bottom</p> <p>5 pipeline.com, is that a different company? 03:34PM</p> <p>6 A. I'm not sure. I don't think so. I</p> <p>7 think Select Mail is a company. I am not sure</p> <p>8 about a company named pipeline or anything like</p> <p>9 that.</p> <p>10 Q. Turn the page it says, "Arthur, I got 03:34PM</p> <p>11 it down to 4,054 names by eliminating</p> <p>12 duplicates, doubtful addresses and people that</p> <p>13 have moved."</p> <p>14 Do you see that?</p> <p>15 A. Yes. 03:34PM</p> <p>16 Q. Earlier I was asking you about</p> <p>17 scrubbing and you weren't sure if that even</p> <p>18 occurs at Lean Chefs.</p> <p>19 Does it help you remember that it</p> <p>20 does? 03:34PM</p> <p>21 MR. KEYHANI: Objection to form. You</p> <p>22 can answer the question.</p> <p>23 A. Right. I wasn't aware of it but if</p> <p>24 he scrub it I guess he got rid of duplicates.</p> <p>25 Maybe there were duplicates I'm not sure. 03:34PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 Q. That's one of the things he gets paid</p> <p>3 to do, right?</p> <p>4 A. Scrubbing the list? No it's mailing.</p> <p>5 If you look at his invoice, there's nothing in 03:35PM</p> <p>6 there for scrubbing. If he does that, he's</p> <p>7 doing it, just because he's doing it. He also</p> <p>8 helps me with creative sometimes for free, you</p> <p>9 know? So it's just -- he wants us to succeed.</p> <p>10 Q. Does Lean Chefs keep a record of 03:35PM</p> <p>11 customer complaints?</p> <p>12 A. A record of customer complaints...</p> <p>13 Lean Chefs doesn't really get a lot of customer</p> <p>14 complaints. We put out a good product.</p> <p>15 Actually the best product in the market. So you 03:35PM</p> <p>16 don't really get a lot of customer complaints.</p> <p>17 But if there is a customer complaint, it guess</p> <p>18 addressed immediately. Our customer service if</p> <p>19 you look at Yelp we have the highest review in</p> <p>20 the industry. Everybody raves about our 03:36PM</p> <p>21 customer service and they also rave about us</p> <p>22 having the best quality. Other companies have</p> <p>23 two stars, we have almost five stars so everyone</p> <p>24 says we are the best in the industry we take a</p> <p>25 lot of pride in that and it's not only food, 03:36PM</p>

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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 it's customer service also. It's the whole</p> <p>3 experience on our program. With that said, we</p> <p>4 don't get a lot of cusp complaints but if we do</p> <p>5 get a complaint, it gets addressed immediately. 03:36PM</p> <p>6 Q. Again, thank you for that. But my</p> <p>7 question was does Lean Chefs keep a record of</p> <p>8 customer complaints?</p> <p>9 A. That's a data question. Once again I</p> <p>10 do sales, marketing. I have my hands in a 03:36PM</p> <p>11 little bit of everything but I don't know</p> <p>12 exactly how that's kept. So I don't want to</p> <p>13 give you the wrong answer.</p> <p>14 Q. When a customer calls to complain, is</p> <p>15 it brought to your attention? 03:36PM</p> <p>16 A. We have a lot of customers. If they</p> <p>17 brought up every complaint or every happy</p> <p>18 client, I mean it would inundate my day, so no I</p> <p>19 don't hear everything that's going on.</p> <p>20 Q. Do you hear some things that are 03:37PM</p> <p>21 going on with respect to customer complaints?</p> <p>22 A. Periodically I'll hear, you know, by</p> <p>23 being involved in the company, I might hear</p> <p>24 things from time to time but I make sure</p> <p>25 everything is addressed. Every customer leaves 03:37PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 us for the most part we try to make it their</p> <p>3 experience even if they have a complaint we try</p> <p>4 to rectify it and compensate them and make them</p> <p>5 happy. 03:37PM</p> <p>6 (Plaintiff's Exhibit 8, Email dated</p> <p>7 7/22/14 from Murawsky to</p> <p>8 Support@leancheffs.com with attachment,</p> <p>9 Bates stamped LC NATIVE 85.001 through</p> <p>10 402.001, marked for identification, as of</p> <p>11 this date.)</p> <p>12 BY MR. O'BRIEN:</p> <p>13 Q. Let me show you what we marked as</p> <p>14 Exhibit 8 for identification. I'll represent</p> <p>15 that it's a number of emails of different dates. 03:38PM</p> <p>16 Have you have seen any of those</p> <p>17 before?</p> <p>18 A. Jodie Kramer. That was during the</p> <p>19 storms in February, Jodie Kramer came back on</p> <p>20 the program months later, loved the program and 03:38PM</p> <p>21 she was compensated, we gave her free days and</p> <p>22 she became a happy client and did nothing but</p> <p>23 praise the program thereafter but unfortunately</p> <p>24 with the storm, she couldn't get her delivery.</p> <p>25 Q. You've seen that email before? 03:39PM</p>
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<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 A. I haven't seen this email but I know</p> <p>3 Jodie Kramer.</p> <p>4 Q. That was my question. Have you seen</p> <p>5 any of these emails before? 03:39PM</p> <p>6 A. I get a lot of emails that come</p> <p>7 through but I don't read every one of them so</p> <p>8 I'm not really sure.</p> <p>9 Q. When they come through --</p> <p>10 A. Customer service deals with it. 03:39PM</p> <p>11 Q. And do you know whether customer</p> <p>12 service keeps a record --</p> <p>13 A. I'm not sure. I'm not sure.</p> <p>14 THE REPORTER: Wait until he finishes</p> <p>15 his completely because the record will not</p> <p>16 make any sense.</p> <p>17 A. I'm sorry, that was the same question</p> <p>18 as before.</p> <p>19 (Plaintiff's Exhibit 9, Email dated</p> <p>20 8/27/14 from Arthur Vincent to Fiala and</p> <p>21 others with attachment, beginning with Bate</p> <p>22 stamp LC NATIVE 310.001, marked for</p> <p>23 identification, as of this date.)</p> <p>24 BY MR. O'BRIEN:</p> <p>25 Q. Let me show you what we marked as 03:40PM</p>	<p>1 * ROUGH - CONFIDENTIAL - ATTORNEYS' EYES ONLY *</p> <p>2 Exhibit 9 for identification. That's your</p> <p>3 email, right?</p> <p>4 A. Yes.</p> <p>5 Q. You say, we will re-mail what we have 03:41PM</p> <p>6 left to this list again in two weeks.</p> <p>7 What does that mean?</p> <p>8 A. I would think based on the email</p> <p>9 before that from list a complete list of Jeff it</p> <p>10 from Jeff at sewn elite, this includes 03:41PM</p> <p>11 addresses, emails and phone numbers, so based on</p> <p>12 the email before that, I would assume that</p> <p>13 that's the list. We took over all the clients</p> <p>14 from Zone Diet Elite during the summer when they</p> <p>15 went out of business. They called us and they 03:41PM</p> <p>16 said they were looking at a company to service</p> <p>17 their clients because they couldn't afford to</p> <p>18 feed them similar to what happened in the past</p> <p>19 from Zone Gourmet. They said that being that we</p> <p>20 have the best quality in the industry, that they 03:42PM</p> <p>21 want us to service their clients so we fed their</p> <p>22 clients, their database for one week for free</p> <p>23 and they gave us their database in exchange for</p> <p>24 that. That was Zone Diet Elite because we're</p> <p>25 the best. 03:42PM</p>